

EXHIBIT F

From: [Alex Kaufman](#)
To: [Kenneth McLellan](#)
Cc: [Keith Roussel](#); eunderriner@hallboothsmith.com
Subject: Re: Garmashov v .USPA
Date: Monday, February 20, 2023 7:47:47 PM
Attachments: [image001.png](#)
[image002.png](#)

For Settlement Negotiation Purposes Only

Kenneth:

We are in receipt of your correspondence and draft. It will be sent to Mr. Garmashov.

On first blush, I expect that at this juncture and do to your Party's actions, that Mr. Garmashov will want to be compensated for the substantial delays and costs that he had to incur. These unnecessary expenses are well in excess of \$5,000. I additionally expect that in order for Mr. Garmashov to entertain additional back and forth and the dismissal of his Motion for Contempt, that he would like to be reinstated, or at a minimum that his application for RE admission will not be unreasonably denied.

I also expect that the inclusion of the new provision of a mutual non disparagement and a liquidated damages provision- which was NOT in the enforced agreement will be rejected.

I will let you know as soon as I have Mr. Garmashov's response to your new offer.

Alex B. Kaufman, Esq.

Member

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On Feb 20, 2023, at 6:43 PM, Kenneth McLellan <mclellan.k@wssllp.com> wrote:

Mr. Kaufman-

Annexed please find an updated and revised proposed settlement agreement and stipulation of dismissal with prejudice. Please review the attached, and let us know your thoughts.

Thank you.

-Ken

Very truly yours,

Kenneth A. McLellan
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(Admitted in NY and NJ)
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<2023.02.20, Letter to A. Kaufman.pdf>

<2023.02.21 Garmashov Settlement Agreement, Proposed.pdf>

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Kenneth McLellan

From: Alex Kaufman <akaufman@chalmersadams.com>
Sent: Tuesday, February 21, 2023 12:40 PM
To: Kenneth McLellan
Cc: Keith Roussel; eunderriner@hallboothsmith.com
Subject: Re: Garmashov v .USPA

For Settlement Negotiation Purposes Only

Kenneth:

Mr. Garmashov is willing to dismiss the motion for contempt after receipt in good funds care of my new firm's trust account (wire instructions will be sent upon USPA's agreement of the following terms):

\$150,000 settlement payment in 3 days

\$20,000 in 3 days - comprised of the interest on the settlement payment since the court's order and attorney's fees since the motion to enforce was granted till present.

Reinstatement of Mr. Garmashov's USPA membership and all ratings.

Mr. Garmashov is not interested in the new proposed terms of a mutual non disparagement or liquidated damages provision. These terms would be removed from your draft.

Within 3 business days of USPA's compliance with the above terms, we would file the mutual dismissal with prejudice.

Alex B. Kaufman, Esq.

Member

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Kenneth A. McLellan
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